

Michael J. Goettig (MG-3771)
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Attorneys for Plaintiff Merrill Lynch Business Financial Services Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MERRILL LYNCH BUSINESS FINANCIAL
SERVICES INC.,

Plaintiff,

-against-

ARTHUR KUPPERMAN; E. ROSS BROWNE;
PAULETTE KRELMAN; PGB
INTERNATIONAL, LLC; and J.P. MORGAN
CHASE BANK, NATIONAL ASSOCIATION,

Defendants.

Case No. 06-Civ-4802 (DMC)

**CERTIFICATION OF MICHAEL J.
GOETTIG IN SUPPORT OF THE
PRO HAC VICE ADMISSION OF
RANDALL M. LENDING
(Returnable October 31, 2008)**

MICHAEL J. GOETTIG hereby certifies as follows:

1. I am an attorney-at-law in the State of New Jersey and an associate at the firm of Vedder Price P.C., counsel for plaintiff Merrill Lynch Business Financial Services Inc. ("Merrill Lynch"). I am a member in good standing of the bar of the U.S. District Court of the District of New Jersey.

2. I make this Certification in support of the *pro hac vice* admission of Randall M. Lending, Esq. ("Mr. Lending"), of Vedder Price P.C., 222 North LaSalle Street, Suite 2600, Chicago, Illinois 60601.

3. I agree to be responsible for the conduct of Mr. Lending, and to ensure that he complies with the applicable rules.

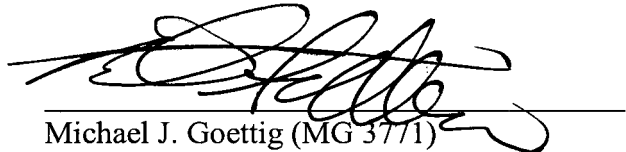
4. Merrill Lynch has requested that Mr. Lending represent it in this litigation. Mr. Lending is familiar with the facts, issues, and pleadings in this action, and no delay in the discovery, motions, trial or any other proceeding will be occasioned by his *pro hac vice* admission in this matter.

5. For the reasons set forth in the accompanying Certification of Randall M. Lending, Esq., there is good cause for his *pro hac vice* admission.

6. On Mr. Lending's behalf, I hereby request that he receive notification via electronic mail of all electronic filings in the above captioned action by delivering such notification to the e-mail address rlending@vedderprice.com.

7. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: October 13, 2008


Michael J. Goettig (MG 3771)